

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re DMCA Section 512(h) Subpoena to Discord,
Inc.

Case No. 3:23-mc-00062-S

**NEXON KOREA CORPORATION’S MOTION TO COMPEL CLOUDFLARE, INC.
TO RESPOND TO THE DMCA SECTION 512(h) SUBPOENA**

TO THE HONORABLE JUDGE OF SAID COURT:

Nexon Korea Corporation (“Nexon”), through counsel, hereby submits this Motion to Compel Discord Inc.’s (“Discord”) Responses to the DMCA Section 512(h), and respectfully requests that this Court enter an order requiring Discord to produce responses to the DMCA subpoena. In support of this motion, Nexon respectfully shows the Court as follows:

RELEVANT FACTS

1. Nexon Korea Corporation is an interactive video game company, which has created several successful video game franchises. Nexon owns valid and subsisting copyrights in popular video games, such as MapleStory, MapleStory2, Sudden Attack, The Kingdom of the Winds, Dungeoin & Fighter, Grand Chase, and Elsword.

2. Discord, Inc. is a voice, video, and text communication service, which individuals often use to post pirated versions of video games, including those created by Nexon.

3. On several occasions, Nexon sent Discord Digital Millennium Copyright Act (DMCA) Notices, notifying the service provider that several of its users were using its services to provide access to pirated material, in violation of Nexon's copyrights.

4. However, on each occasion, Discord failed to remove the servers containing the infringing material, and in some cases, in the event of removal, the users were allowed to maintain their Discord accounts and simply reupload the material on the platform.

5. Therefore, on September 27, 2023, Nexon, through its undersigned counsel, filed a request for issuance of a DMCA Subpoena, pursuant to 17 U.S.C. §512(h), requesting that Cloudflare provide information sufficient to identify the users who violated its intellectual property rights. *See Exhibit A.*

6. This Court issued the subpoena on October 3, 2023, ordering Discord to respond by October 13, 2023. However, to date, Discord has failed to produce any responsive documents or written responses on or before the time for compliance.

7. Rather, Discord provided form responses, and citing overbreadth of the subpoena and undue burden as the reason for its failure to provide substantive responses to Nexon's request and provided a spreadsheet of users. *See Exhibit B.*

8. In an effort to limit the scope of the subpoena and make compliance less burdensome for Discord, Nexon, through its counsel, agreed to limit the requests to production of information regarding individuals who are currently the subject of an ongoing investigation into infringement of the copyrighted material. *See Exhibit C.*

9. Once again, Discord raised objections, citing undue burden and expense.

10. Discord's failure to cooperate with discovery has impeded Nexon's ability to discovery relevant, non-privileged information that will support its potential claims against the users who posted the infringing material.

11. Therefore, Nexon files this motion requesting that this Court compel Discord to produce the documents to which Nexon are rightfully entitled.

ARGUMENTS AND AUTHORITIES

12. Section 512(h) permits a copyright owner to request a court to issue a subpoena to a service provider for identification of an alleged infringer. Additionally, Section 512(h)(5) provides that "upon receipt of the issued subpoena [...] the service provider shall expeditiously disclose to the copyright owner or person authorized by the copyright owner the information requested by the subpoena."

13. However, despite receiving a valid subpoena and having substantial time to respond, Discord has failed to satisfy its obligation to produce responsive documentation pursuant to Section 512(h) and Federal Rule of Civil Procedure 45.

14. If this Court grants Nexon Korea Corporation's Motion, Nexon is entitled to its attorneys' fees and expenses involved in securing the ruling, pursuant to Fed. R. Civ. P. 37.

15. In the event that this Court grants Nexon's Motion, Nexon submits the Singhe Affidavit detailing its attorneys' fees and expenses. *See Exhibit D*. Nexon respectfully requests that the Court award Nexon its attorneys' fees and expenses in connection with its Motion.

CONCLUSION

16. An order compelling Cloudflare's production of responsive documents is appropriate, as Cloudflare's noncompliance has hindered Nexon's ability to identify the infringers and bring claims against them.

PRAYER FOR RELIEF

FOR THESE REASONS, Nexon Korea Corporation respectfully pray that the Court enter an order requiring Discord to produce responsive documents and award Nexon Korea Corporation its attorney's fees related to this motion.

Date: December 20, 2023

Respectfully submitted,
SUL LEE LAW FIRM, PLLC

By: /s/ Dominique Williams

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**ATTORNEYS FOR NEXON
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October 3, 2023

The United States District Court
1100 Commerce Street, Room 1452
Dallas, Texas 75242

RE: Amended Request for DMCA Subpoena pursuant to 17 U.S.C. §512(h)

Dear Ms. Mitchell,

The undersigned firm represents Nexon Korea Corporation (“Nexon” or the “Copyright Owner”), the developer of the MapleStory, MapleStory2, Sudden Attack, The Kingdom of the Winds, Dungeon & Fighter, Grand Chase, and Elsword video games. On behalf of Nexon, I respectfully request that the Clerk issue a subpoena pursuant to 17 U.S.C. § 512(h).

By way of background, Section 512(h) of the Digital Millennium Copyright Act provides that a “copyright owner or a person authorized to act on the owner’s behalf may request the clerk of any United States District Court to issue a subpoena to a service provider for identification of an alleged infringer in accordance with this subsection.” 17 U.S.C. § 512(h)(1). For a subpoena to be issued, Section 512(h) requires that a copyright owner file the following with the Clerk:

1. A copy of the DMCA takedown notification required by Section 512(c)(3)(A);
2. A proposed subpoena; and
3. A sworn declaration to the effect that the purpose for which the subpoena is sought is to obtain the identity of an alleged infringer and that such information will only be used for the purpose of protecting rights under this title.

Accordingly, attached for filing with the Clerk is Nexon’s notification, a proposed subpoena, and a sworn declaration. As Nexon has complied with the requirements of the statute, they ask that the Clerk expeditiously issue a subpoena ordering Discord to disclose Nexon information sufficient to identify the infringers, including the individuals’ names, physical addresses, IP addresses, telephone numbers, email addresses, payment information, account updates and account history, as available, within 14 days of the issuance of the subpoena.

If you have any questions or concerns, please feel free to contact me via email at dwilliams@sulleelaw.com, via telephone at 214-206-4064, or via mail at 3030 Lyndon B. Johnson Fwy, Suite 220, Dallas, Texas 75234.

We appreciate your attention to this matter and await your response.

Sincerely,
/s/ Dominique Williams

Dominique Williams
SUL LEE LAW FIRM, PLLC
Associate Attorney

**DECLARATION OF DOMINIQUE WILLIAMS IN SUPPORT OF ISSUANCE OF
SUBPOENA PURSUANT TO 17 U.S.C. §512(h)**

STATE OF TEXAS §

§

COUNTY OF DALLAS §

I, Dominique Williams, declare and testify as follows:

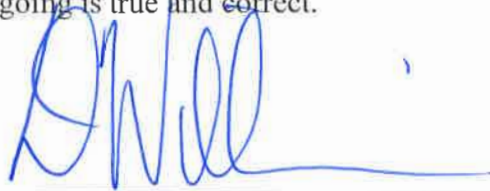
1. I am an attorney at law, duly licensed to practice in the State of Texas since 2021, SBOT No. 24125458. I am over the age of majority and under no legal impediment to state the following facts, all of which are true and correct and within my personal knowledge.

2. I and my law firm have been engaged to represent Nexon Korea Corporation, a Korean corporation that designs and owns copyrights in several popular video games. By operation of such engagement and my admission to the State Bar of Texas, I am authorized and qualified to make this declaration for and on Nexon Korea Corporation's behalf, and I make this declaration for that reason.

3. Nexon Korea Corporation seeks the issuance of a subpoena from this Court pursuant to 17 U.S.C. §512(h) to obtain information sufficient to identify the persons infringing its copyrighted works. Such identification is sought so that Nexon Korea Corporation, the rightful copyright holder, can seek legal redress against such infringers. Such personally identifying information will only be used for the purpose of protecting Nexon Korea Corporation's rights under the Copyright Act, 17 U.S.C. 101, *et. seq.*

4. Pursuant to 28 U.S.C. § 1746, I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on September 27, 2023



Dominique Williams

UNITED STATES DISTRICT COURT

for the

_____ District of _____

Plaintiff

v.

Defendant

)
)
)
)
)
)

Civil Action No. _____

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION**

To:

(Name of person to whom this subpoena is directed)

☐ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material:

Place:	Date and Time:
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☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:	Date and Time:
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The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: _____

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing *(name of party)* _____, who issues or requests this subpoena, are:

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. _____

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* _____
on *(date)* _____.

☐ I served the subpoena by delivering a copy to the named person as follows: _____

_____ on *(date)* _____; or

☐ I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____.

I declare under penalty of perjury that this information is true.

Date: _____
_____ *Server's signature*

Printed name and title

Server's address

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)**(c) Place of Compliance.**

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
 - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

EXHIBIT A
REQUEST FOR PRODUCTION

1. Produce all information sufficient to identify the operator and/or owner (the “Infringers”) of each of the servers who uploaded, hosted, and/or contracted with other providers to host the infringing content identified in the Exhibits attached to the DMCA Takedown NCotice dated September 20, 2023, sent by Mr. Sungchul Hwang on behalf of Nexon Korea Corporation (“Nexon”), requesting takedown of infringing MapleStory, MapleStory 2, The Kingdom of the Wings, Dungeon & Fighter, Grand Chase, and Elsword material (the “Copyrighted Material”) attached to this subpoena, from any and all sources, including but not limited to, billing or administrative records that prove the following information used by each of the Infringers, along with a time-stamp, from the time of user registration and to date: (a) name(s), (b) last known address(es), (c) last known telephone number(s), (d) any and all email address(es), (e) account number(s), and (f) billing information (including, but not limited to, names, telephone number(s), and mailing and billing address(es) of each of all of the payment methods (including, but not limited to, credit cards, bank accounts, and any online payment systems)); (g) hosting provider(s), (h) server(s), (i) any other contact information; and (j) any and all logs of IP address(es).

Date: Sep. 20th, 2023

To Copyright Agent:

This notice is submitted by DAZIUNDA, LLC, on behalf of NEXON Korea. ("**Copyright Owner**"), pursuant to the Digital Millennium Copyright Act (the "**Act**") and Discord's Terms of Service.

The Copyright Owner possesses the exclusive rights to the copyrighted work (the "**Work**") identified below:

1. Title of the Work: MapleStory
 - A. Official Website: <https://maplestory.nexon.com/>
 - B. Description of the Work: MapleStory(Korean: 메이플스토리) is a 2D side-scrolling massively multiplayer online role-playing game developed and serviced by NEXON Korea.
2. Title of the Work: MapleStory2
 - A. Official Website: <https://maplestory2.nexon.com/>
 - B. Description of the Work: MapleStory2(Korean: 메이플스토리2) is 3D massively multiplayer online role-playing game developed and serviced by NEXON Korea.
3. Title of the Work: Sudden Attack
 - A. Official Website: <https://sa.nexon.com/>
 - B. Description of the Work: Sudden Attack(Korean: 서든어택) is a free-to-play multiplayer first-person shooter online game serviced by NEXON Korea
4. Title of the Work: The Kingdom of the winds
 - A. Official Website: <https://baram.nexon.com/>
 - B. Description of the Work: The Kingdom of the winds(Korean: 바람의 나라) is a 2D massively multiplayer online role-playing game developed and serviced by NEXON Korea.
5. Title of the Work: Dungeon & Fighter
 - A. Official Website: <https://df.nexon.com/>
 - B. Description of the Work: Dungeon & Fighter(Korean: 던전애파이터) is a 2D side-scrolling massively multiplayer online role-playing game serviced by NEXON Korea
6. Title of the Work: Grand Chase
 - A. Official Website: <https://grandchase.nexon.com/>
 - B. Description of the Work: Grand Chase(Korean: 그랜드체이스) is 3D side-scrolling massively multiplayer online role-playing game serviced by NEXON Korea

7. Title of the Work: Elsword

- A. Official Website: <https://elsword.nexon.com/>
- B. Description of the Work: Elsword(Korean: 엘소드) is 3D side-scrolling massively multiplayer online role-playing game serviced by NEXON Korea

We have discovered that private servers, private server promoters, designers associated with private servers and cheat software sellers infringing upon the rights of the Copyright Owner, have been set up on Discord for illicit commercial activities, actively recruiting users.

This DMCA Notice has been written to request the immediate blockage of their servers, channels, and any IDs involved in the copyright infringement.

Please find below a detailed description of how each copyright infringer utilizes Discord for their infringing activities.

I. Private Server

1. Circumventing the technological protective measures applied to the online game client developed and serviced by the Copyright Owner.
 - A. Analyzing server-client communications through reverse engineering and developing server emulators imitating the server software developed by the Copyright Owner.
 - B. Modifying the game client to connect to their server emulator IP.
2. Providing services related to the Work without lawful permission.
 - A. Establishing accounts and servers on various OSPs, including Discord, to offer Work-related services for profit.
 - i. Building websites.
 - ii. Creating Discord IDs, servers, and channels.
 - iii. Establishing Facebook pages and groups.
 - B. Distributing the game client link modified as per section 1B on various OSPs including Discord.
 - C. Directing users to connect to their private servers through the client mentioned in section 2B.
3. Engaging in illicit commercial activities without the permission of the Copyright Owner.
 - A. Setting up various payment methods like PayPal, Paymentwall, and bank accounts.
 - B. Creating various in-game items on the altered client as per section 1 and promoting

them through various OSPs established in section 2.

- C. Guiding users through Discord IDs to payment methods, selling in-game items through conversations, and obtaining illegal profits.

II. Private Server Promoter

1. Creation of a Discord server specifically for promoting private servers.
2. Dissemination of invitation links to private server operators and users.
3. Informing private server operators about server promotion costs via Discord DMs.
4. Granting special roles within the Discord server to private server operators who have paid the promotion fees.
5. Establishing a channel named after the private server for promotional purposes and granting administrative privileges to the operators.

III. Designers associated with Private Servers

1. Creation of a Discord server to provide design works to private server operators and receive compensation in return
2. Setting up channels within the server to post design portfolios.
3. Sharing the Discord server invitation link with private server operators and encouraging them to join.
4. Informing the joined private server operators about the time and cost per design work via DMs, thus gaining financial benefits.
5. Producing image files using illustrations, character images, and other copyrighted materials from the Work, and then sending them to private server operators via DM.

IV. Cheat software sellers

1. Development of a Cheat software that disables the technical protection measures applied to the Work and allows for actions not permitted within the game.
2. Creation of a Discord server and promotion of invitation codes to users of the Work.
3. Establishment of channels specific to each Cheat software, posting descriptions of the software's functionalities and prices.

4. Selling serial numbers of the Cheat software to purchasers via DMs, thus obtaining financial gains.

As illustrated, those involved in various forms of copyright infringement are using Discord services to maximize their illegal gains. For effective prevention of their infringing activities, immediate blocking of the Discord servers mentioned in this document is imperative.

It is important to note that simply deleting the message links cited as examples might not fully address the issue. These are instances of copyright infringement on Discord servers. To ensure comprehensive resolution, considering the blocking of both servers and the IDs of infringers might be beneficial. This can prevent continued infringing activities and protect the interests of all involved parties.

Exhibits attached to this document provide the server IDs of each Discord Server, UUIDs of the infringers, and example message links demonstrating the infringing activities, as elaborated upon for each infringer.

I hereby state, under penalty of perjury, that the information contained in this Notice is accurate and that I am the authorized agent acting on behalf of the Copyright Owner. I have a good faith belief that the use of the Work described above, and used in the manner complained of, is not authorized by the Copyright Owner, its agent, or under the law.

We trust you will understand our concerns and, as stipulated in Sections 512(c)(1)(C) and 512(d)(3) of the Act and in accordance with Discord's own Terms of Service, we demand the immediate blocking of the Discord servers used for copyright infringement.

Please contact the undersigned no later than one week from the date of this letter to confirm that the infringing materials have been removed or access disabled. The undersigned may be contacted at the email address set forth as follows:

Name and Title: Sungchul Hwang, Technician

Company: DAZIUNDA, LLC.

Address: 675 Dalseo-daero, Dalseo-gu, Daegu, 42601, Republic of Korea

Email address: shiraz@daziunda.com

Telephone: +82-10-6514-1723

Truthfully

A handwritten signature in black ink, appearing to be 'Sungchul Hwang', written over a horizontal line.

Sungchul Hwang

Exhibits – Private Server

1. Infringed Work – MapleStory

Server Name	Category	Description
로얄메이플	Website (if applicable)	https://mapleroyal.cc/
	Discord Server ID	964822228724244530
	Infringer UID	871229837380034601, 761916413912678450
	Invite Code	https://discord.com/invite/royalmaple
	Example message link of infringing activity	https://discord.com/channels/964822228724244530/979575719195705354/1126625454321848472
나나스토리	Website (if applicable)	
	Discord Server ID	1131827395104616561
	Infringer UID	1125676006502584330
	Invite Code	https://discord.com/invite/cFvMbhfVq4
	Example message link of infringing activity	https://discord.com/channels/1131827395104616561/1131851269758255155/1134363931884920892
니르바나	Website (if applicable)	
	Discord Server ID	1109426846015164416
	Infringer UID	1033704371348852848, 1024368046116188180, 331724026877837312, 434092344581816330, 107495484037300224
	Invite Code	https://discord.com/invite/jYbEN3JMeP
	Example message link of infringing activity	https://discord.com/channels/1109426846015164416/1109428605487956069/1115952924128976947
달빛월드	Website (if applicable)	
	Discord Server ID	1054360713407254558
	Infringer UID	1054358551482613790
	Invite Code	https://discord.com/invite/Mq2mea9zT9
	Example message link of infringing activity	https://discord.com/channels/1054360713407254558/1054489845730381965/1134383159706910772
더블랙	Website (if applicable)	
	Discord Server ID	1118884714950971495
	Infringer UID	1118883355841282160, 633579801436880916

	Invite Code	https://discord.com/invite/ux7BhGTD9q
	Example message link of infringing activity	https://discord.com/channels/1118884714950971495/1118963200419971102/1135241310958276718
마르디아	Website (if applicable)	
	Discord Server ID	1042506166854492290
	Infringer UID	1040367342535843851, 1130876720757604413
	Invite Code	https://discord.com/invite/43HS4fTHux
	Example message link of infringing activity	https://discord.com/channels/1042506166854492290/1042510622916628480/1130881472073576538
메리엘	Website (if applicable)	
	Discord Server ID	1105271478150234244
	Infringer UID	1050764025060937728, 804158172494561290
	Invite Code	https://discord.com/invite/hmXVFR9vVQ
	Example message link of infringing activity	https://discord.com/channels/1105271478150234244/1105282759221587968/1124869027102212096
보헤미안	Website (if applicable)	
	Discord Server ID	1127549167129079820
	Infringer UID	1126866085472387082
	Invite Code	https://discord.com/invite/cze8juG9kp
	Example message link of infringing activity	https://discord.com/channels/1127549167129079820/1132261952828223550/1132594764378808432
아리엘	Website (if applicable)	
	Discord Server ID	1101439954728530031
	Infringer UID	1100012824547303445
	Invite Code	https://discord.com/invite/keqATsH4sa
	Example message link of infringing activity	https://discord.com/channels/1101439954728530031/1103877058469298279/1103877092535451694
엘니도	Website (if applicable)	
	Discord Server ID	1026870545410707517
	Infringer UID	947243390951637052, 1038481360974794882, 409258554940456971

	Invite Code	https://discord.com/invite/AF2qUSRMGC
	Example message link of infringing activity	https://discord.com/channels/1026870545410707517/1126894943915495576/1141314150337871872
엘리시아	Website (if applicable)	
	Discord Server ID	1020904508924121118
	Infringer UID	878319845228302368, 475653539637493760, 1114199652728836237, 391088733476093952
	Invite Code	https://discord.com/invite/3RfQKzvgnD
	Example message link of infringing activity	https://discord.com/channels/1020904508924121118/1118879349211414558/1118879349211414558
엘리트	Website (if applicable)	
	Discord Server ID	1032262304387059754
	Infringer UID	311386662015860736
	Invite Code	https://discord.com/invite/sWSnfG5PxX
	Example message link of infringing activity	https://discord.com/channels/1032262304387059754/1117670153774170203/1138489999008993370
연화	Website (if applicable)	
	Discord Server ID	1030748025611632650
	Infringer UID	910985312535195728, 1029084097835958373, 1027803455361921078, 1035222721774235698
	Invite Code	https://discord.com/invite/YEONHWA
	Example message link of infringing activity	https://discord.com/channels/1030748025611632650/1118186021507567696/1118186021507567696
오리진	Website (if applicable)	
	Discord Server ID	1128292662034825288
	Infringer UID	947979138667540511
	Invite Code	https://discord.com/invite/HHYDzTb3JF
	Example message link of infringing activity	https://discord.com/channels/1128292662034825288/1138728294406180875/1138728698900643840
추억	Website (if applicable)	
	Discord Server ID	1094653302555295904
	Infringer UID	1094651229411495977

	Invite Code	https://discord.com/invite/yRFWcvAwhN
	Example message link of infringing activity	https://discord.com/channels/1094653302555295904/1094662279934517358/1118383072518344854
헤븐	Website (if applicable)	
	Discord Server ID	1042521202217984090
	Infringer UID	380220821630877697, 1044161576246194227
	Invite Code	https://discord.com/invite/vDfpRsMryS
	Example message link of infringing activity	
베리즈	Website (if applicable)	
	Discord Server ID	1145419190828810430
	Infringer UID	1089508646666391564
	Invite Code	https://discord.com/invite/HwcQ2zMHnJ
	Example message link of infringing activity	https://discord.com/channels/1145419190828810430/1145420195842773053/1148961645276704828
나노메이플	Website (if applicable)	
	Discord Server ID	1145316604792557668
	Infringer UID	1145315916473696357
	Invite Code	https://discord.gg/FXxyQC6uxJ
	Example message link of infringing activity	https://discord.com/channels/1145316604792557668/1145320257200848936/1146038906043781230
클래스리마스터	Website (if applicable)	
	Discord Server ID	1112739691582738484
	Infringer UID	1093356432646209556
	Invite Code	https://discord.com/invite/ECVebcpSQ
	Example message link of infringing activity	https://discord.com/channels/1112739691582738484/1112743265159086101/1129223438410715256
파스텔	Website (if applicable)	
	Discord Server ID	1043088654215680080
	Infringer UID	1042794887088713742

	Invite Code	https://discord.com/invite/pR4sSaFCk9
	Example message link of infringing activity	https://discord.com/channels/1043088654215680080/1043089950154952704/1043835143237935114
일리시움	Website (if applicable)	
	Discord Server ID	1074227978436878339
	Infringer UID	1064176770401701928
	Invite Code	https://discord.com/invite/QCz2hQTbAb
	Example message link of infringing activity	https://discord.com/channels/1074227978436878339/1074232457148235886/1074232457148235886
MapleRoyals	Website (if applicable)	https://mapleroyals.com/
	Discord Server ID	1008174423846686801
	Infringer UID	193812754748932097, 234419725264748545, 363925896542945281, 643637551521071104, 523378611504545802, 192326524605693953, 661979159005757441, 306742152057192448, 124900571210579968
	Invite Code	https://discord.com/invite/MzVfDU5PTP
	Example message link of infringing activity	https://discord.com/channels/1008174423846686801/1008469418227019786/1113820806166876220
MapleLegends	Website (if applicable)	https://maplelegends.com/
	Discord Server ID	969341430596239420
	Infringer UID	209979685793169409, 471028041884106755, 145991605294202881, 480184783540977684, 187213676007129089, 484072796184510464, 266106931414958081
	Invite Code	https://discord.com/invite/MapleLegends
	Example message link of infringing activity	https://discord.com/channels/969341430596239420/969404011407110164/971458813465067620
Kaizen MS	Website (if applicable)	https://kaizenms.net/
	Discord Server ID	1089434657877151798
	Infringer UID	384136868922392577, 916420967662760037, 681977430436741150
	Invite Code	https://discord.com/invite/VnbfEmfSKv
	Example message link of infringing activity	https://discord.com/channels/1089434657877151798/1089476204404420618/1093829107357335593
AriesMS	Website (if applicable)	https://aries.elluel.net/

	Discord Server ID	983558194771136522
	Infringer UID	954639290955100171, 112048536610230272, 905369471399641099, 709246694587629619, 1062662917637558322
	Invite Code	https://discord.com/invite/yfZaUDN9QX
	Example message link of infringing activity	https://aries.elluel.net/?page=download Unable to find the message link, so the download URL from the website is indicated.
MapleSaga	Website (if applicable)	https://maplesaga.com/
	Discord Server ID	1100932401636585583
	Infringer UID	1100931593956241429
	Invite Code	https://discord.com/invite/t6wCkKWA
	Example message link of infringing activity	https://discord.com/channels/1100932401636585583/1122357173922574368/1122357214800269393
DreamMS	Website (if applicable)	https://dreamms.gg/
	Discord Server ID	920833230704361483
	Infringer UID	509461724613705747, 376239020427968523, 101832932653531136, 219415732075626497, 1101038194893520946, 346764205195526145
	Invite Code	https://discord.com/invite/dreamms
	Example message link of infringing activity	https://discord.com/channels/920833230704361483/1019902532438462504/1084191032138276894
AmoriaMS	Website (if applicable)	https://amoria.ms/
	Discord Server ID	1027016983524425768
	Infringer UID	1006311848091603115, 326979713245642754, 163332777352101889
	Invite Code	https://discord.com/invite/PyJ5xg2mNh
	Example message link of infringing activity	https://discord.com/channels/1027016983524425768/1116978163621310536/1117174718479474788
Maple Lumiere	Website (if applicable)	
	Discord Server ID	952846286304972820
	Infringer UID	424940638870568966, 799590952972451860, 953226673455763526
	Invite Code	https://discord.com/invite/EPs8TbaSDJ
	Example message link of infringing activity	https://discord.com/channels/952846286304972820/952863823046508555/1109560432580100116

Haiku MS	Website (if applicable)	https://maplelumiere.com/
	Discord Server ID	966282526979137566
	Infringer UID	893942580415447051, 761959531763859477
	Invite Code	https://discord.com/invite/haikums
	Example message link of infringing activity	https://discord.com/channels/966282526979137566/996726878754852874/1138711690494623834

2. Infringed Work – MapleStory2

Server Name	Category	Description
MapleStars2	Website (if applicable)	https://maplestars2.to/
	Discord Server ID	992025420738342922
	Infringer UID	989125239508193290, 1028678364959101000, 988446898933358603
	Invite Code	https://discord.com/invite/hwZ99PzH23
	Example message link of infringing activity	https://discord.com/channels/992025420738342922/992028695625728131/1145420727403696309

3. Infringed Work – The Kingdom of the winds

Server Name	Category	Description
곰서버	Website (if applicable)	https://baramyeon.com/
	Discord Server ID	919185316450025472
	Infringer UID	919192763701002310, 502350931459964929
	Invite Code	https://discord.com/invite/rppSeR7j7U
	Example message link of infringing activity	https://discord.com/channels/919185316450025472/919185316450025475/1147857978742018118
도톨서버	Website (if applicable)	https://baram2006.com/
	Discord Server ID	1097098377612767302
	Infringer UID	711211501536673834
	Invite Code	https://discord.com/invite/CKwRD2FTdU
	Example message link of infringing activity	https://discord.com/channels/1097098377612767302/1097098377612767308/1097104048718630972

로얄클래스	Website (if applicable)	
	Discord Server ID	1130783690486726698
	Infringer UID	463880315308343296
	Invite Code	https://discord.com/invite/xMXVg6GrrE
	Example message link of infringing activity	https://discord.com/channels/1130783690486726698/1146704131558494258/1146705497274196048
레이서버	Website (if applicable)	
	Discord Server ID	971042214505500733
	Infringer UID	287481919736643584
	Invite Code	https://discord.com/invite/9nSJGqJBv
	Example message link of infringing activity	https://discord.com/channels/971042214505500733/1008678934604415016/1145720824314220644
리마스터	Website (if applicable)	https://baramrema.com/
	Discord Server ID	1101069480173502515
	Infringer UID	899496219963977779
	Invite Code	https://discord.com/invite/kmnr6uBUhy
	Example message link of infringing activity	https://discord.com/channels/1101069480173502515/1109103076230574081/1138674144343511052
목도	Website (if applicable)	
	Discord Server ID	979000977308938251
	Infringer UID	459600042035118081
	Invite Code	https://discord.com/invite/U4Ndh8hkR
	Example message link of infringing activity	https://discord.com/channels/979000977308938251/979000977875152957/1095178394985058364
도씨검(불홍)	Website (if applicable)	https://boolhong.com/ https://dossisword.com/
	Discord Server ID	1116334541536247849
	Infringer UID	1139798024709754910
	Invite Code	https://discord.com/invite/wdDP6rsyQT
	Example message link of infringing activity	https://discord.com/channels/1116334541536247849/1139800371934535681/1142911958908162199

서월	Website (if applicable)	
	Discord Server ID	819592720284647445
	Infringer UID	810792314578534420, 371269483907514380
	Invite Code	https://discord.com/invite/B4FTb9TfHw
	Example message link of infringing activity	https://discord.com/channels/819592720284647445/819593028729307176/1081046740582539324
설	Website (if applicable)	
	Discord Server ID	1105760887614226482
	Infringer UID	946978171197222913
	Invite Code	https://discord.com/invite/CvKAD9ZPp4
	Example message link of infringing activity	https://discord.com/channels/1105760887614226482/1106078004536426566/1106078250284884048
여울	Website (if applicable)	
	Discord Server ID	1124815716252655767
	Infringer UID	1124812190382305300
	Invite Code	https://discord.com/invite/kwCVNWQaKx
	Example message link of infringing activity	https://discord.com/channels/1124815716252655767/1124818435906474024/1132280809261367366
향기	Website (if applicable)	https://baramhyangky.com/
	Discord Server ID	1129281116394770512
	Infringer UID	1129279878940864563
	Invite Code	https://discord.com/invite/GUkzgDh9af
	Example message link of infringing activity	https://discord.com/channels/1129281116394770512/1129313725900410900/1147857191756370041

4. Infringed Work – Dungeon & Fighter

Server Name	Category	Description
고고서버	Website (if applicable)	
	Discord Server ID	1056887838811095070
	Infringer UID	1009794772090757150, 578585678032666635

	Invite Code	https://discord.com/invite/dnfgogoserer
	Example message link of infringing activity	https://discord.com/channels/1056887838811095070/1056887839331188762/1147116321885138985
다마고치	Website (if applicable)	
	Discord Server ID	998261617122877450
	Infringer UID	996087515750608906
	Invite Code	https://discord.gg/pEF84DQYxG
	Example message link of infringing activity	https://discord.com/channels/998261617122877450/1131361225238904923/1131361283627831508
다마고치파일설치서버	Website (if applicable)	
	Discord Server ID	1013044686178500658
	Infringer UID	996087515750608906
	Invite Code	https://discord.gg/4Xu7P4bE6q
	Example message link of infringing activity	https://discord.com/channels/1013044686178500658/1013103008042725438/1125126609343615118
솔로서버	Website (if applicable)	
	Discord Server ID	1009315858583146506
	Infringer UID	849188971358453790, 298787494852427776, 699204770430451813
	Invite Code	https://discord.com/invite/azdh2AJcef
	Example message link of infringing activity	https://discord.com/channels/1009315858583146506/1009317468562542612/1012628878897991680
스톤서버	Website (if applicable)	
	Discord Server ID	1126488573412130828
	Infringer UID	1126488091742453780
	Invite Code	https://discord.com/invite/cZBHU4XJ4Y
	Example message link of infringing activity	https://discord.com/channels/1126488573412130828/1131390156285427863/1131390212711391232
투데이서버	Website (if applicable)	
	Discord Server ID	1055673919102791730
	Infringer UID	1055672024204324884, 652516091179827221

	Invite Code	https://discord.com/invite/gkeZQFkjp4
	Example message link of infringing activity	https://discord.com/channels/1055673919102791730/1055717828159877141/1055718986840551434

5. Infringed Work – Grand Chase

Server Name	Category	Description
Agnesia Online	Website (if applicable)	https://agnesia.xyz/
	Discord Server ID	801129191016890369
	Infringer UID	94888096872534016, 744975698094981241, 986602882243645450
	Invite Code	https://discord.com/invite/s9ZdYjYu4K
	Example message link of infringing activity	https://discord.com/channels/801129191016890369/988141631721078784/1064180269373997086
Unreal World	Website (if applicable)	
	Discord Server ID	1029984952021946378
	Infringer UID	335801526993944586, 1034629091661463603, 1130629509452922932
	Invite Code	n/a
	Example message link of infringing activity	https://discord.com/channels/1029984952021946378/1029990075364282389/1129117781976166430
Ernasis Online	Website (if applicable)	https://ernasis.xyz/
	Discord Server ID	285041318097453066
	Infringer UID	228275969583087618, 252570710537535489, 164499007245123584, 962467635444985877
	Invite Code	https://discord.com/invite/r7bhnwNH4S
	Example message link of infringing activity	https://discord.com/channels/285041318097453066/454796689186881536/1128814644765655161
Chase Fantasy	Website (if applicable)	https://chasefantasy.com.br/
	Discord Server ID	916140140689231872
	Infringer UID	252617685668462602, 905612017707126796
	Invite Code	https://discord.com/invite/utqfZHnfEj
	Example message link	https://discord.com/channels/916140140689231872/916719544603656222/943696202778681344

	of infringing activity	
Chase History	Website (if applicable)	https://chasehistory.net/
	Discord Server ID	930958255637790770
	Infringer UID	524650465363755041, 417470929325522945, 262695247102869531, 643276841708421153, 243303438656471040, 334871888645980160, 183285042527600640, 246451871051415554, 592451854529593582, 407892854363521024, 452710782552113152, 517657460321026058, 158243227953135617, 282354606225358848, 338594696320516098, 282563385994903553, 870447161043730432, 256208300633358336, 262614246167150602, 662160822008807443, 614971797108031508, 206420067297132544, 334871888645980160, 341996795838201867, 252452032399540225
	Invite Code	https://discord.com/invite/5KBXACWFjz
	Example message link of infringing activity	https://discord.com/channels/930958255637790770/931247448725270538/935523440310493204

5. Infringed Work – Elsword

Server Name	Category	Description
ElsZero	Website (if applicable)	https://elszero.net/
	Discord Server ID	905611290314174524
	Infringer UID	254701061602803723, 661957278051860508, 340784038036111361, 163051261678059520, 242694370795454467, 173551678329454593, 560939942411501575, 167680707072753664
	Invite Code	https://discord.com/invite/sEg7RCT2n8
	Example message link of infringing activity	https://discord.com/channels/905611290314174524/905616521152331816/930665176292786177
ElRosso	Website (if applicable)	
	Discord Server ID	1040290955330326528
	Infringer UID	163051261678059520, 104702718974685184, 340784038036111361, 173551678329454593, 254701061602803723, 711197723881373698, 167680707072753664, 560939942411501575, 1118683173698666557, 429522484715323393
	Invite Code	https://discord.com/invite/7qeafqjpm
	Example message link of infringing activity	https://discord.com/channels/1040290955330326528/1062097464011800637/1112151457060368434

Exhibits – Private Server Promoter

1. Infringed Work – MapleStory

Server Name	Category	Description
프리웨어	Website (if applicable)	
	Discord Server ID	954742710659608617
	Infringer UID	1040122600812187688
	Invite Code	https://discord.com/invite/rx4FMJFCNQ
	Example message link of infringing activity	https://discord.com/channels/954742710659608617/1148248400354103306/1148248457388236801
서버공유방	Website (if applicable)	
	Discord Server ID	1087023612395016353
	Infringer UID	848606213831000074
	Invite Code	https://discord.com/invite/PyCYWZJ64M
	Example message link of infringing activity	https://discord.com/channels/1087023612395016353/1123481226293035059

Exhibits – Designers associated with Private Servers

1. Infringed Work – MapleStory

Server Name	Category	Description
이클립스	Website (if applicable)	
	Discord Server ID	1044094096127561819
	Infringer UID	742785576679374941, 416095865074352129
	Invite Code	n/a
	Example message link of infringing activity	https://discord.com/channels/1044094096127561819/1044131700634030100/1086865698724249672

Exhibits – Private Server Promoter

1. Infringed Work – MapleStory

Server Name	Category	Description
프리웨어	Website (if applicable)	
	Discord Server ID	954742710659608617
	Infringer UID	1040122600812187688
	Invite Code	https://discord.com/invite/rx4FMJFCNQ
	Example message link of infringing activity	https://discord.com/channels/954742710659608617/1148248400354103306/1148248457388236801
서버공유방	Website (if applicable)	
	Discord Server ID	1087023612395016353
	Infringer UID	848606213831000074
	Invite Code	https://discord.com/invite/PyCYWZJ64M
	Example message link of infringing activity	https://discord.com/channels/1087023612395016353/1123481226293035059

Exhibits – Cheat Software Seller

1. Infringed Work – MapleStory

Server Name	Category	Description
MapleSpirits	Website (if applicable)	https://www.maplespirit.net/
	Discord Server ID	994541014490550292
	Infringer UID	305387689660907530, 206881044916469760, 125118828123258880
	Invite Code	https://discord.com/invite/XNBKbgw8z
	Example message link of infringing activity	https://discord.com/channels/994541014490550292/994554558313398302/1126546196878589974 https://discord.com/channels/994541014490550292/1049317508961804288/1049317968661725244

2. Infringed Work – Sudden Attack

Server Name	Category	Description
스완	Website (if applicable)	
	Discord Server ID	1111257063524413474
	Infringer UID	1111223462569201724, 961877053068689459, 1020587264276971530
	Invite Code	https://discord.com/invite/pAB8BykUCN
	Example message link of infringing activity	https://discord.com/channels/1111257063524413474/1144409110889119784/1147346169257795615 https://discord.com/channels/1111257063524413474/1111257064652685371/1132533876556832830
스노우물	Website (if applicable)	
	Discord Server ID	902200384607641601
	Infringer UID	789726809632669726
	Invite Code	https://discord.gg/sURfYC4v3A
	Example message link of infringing activity	https://discord.com/channels/902200384607641601/1093517368682086470/1133077261810155520 https://discord.com/channels/902200384607641601/1030657341835706388/1074704630061211749

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AFFIDAVIT OF SERVICE

UNITED STATES DISTRICT COURT
Northern District of Texas

Case Number: 3:23-MC-00061

**IN RE DMCA SECTION 512(H) Subpoena
to IPXO**

Received these papers on the 5th day of October, 2023 at 8:45 am to be served on **IPXO LLC care of its Registered Agent, ZENBUSINESS, INC, 5511 Parkcrest Drive, Suite 103, Austin, Travis County, TX 78731.**

I, Vivian Smith, being duly sworn, depose and say that on the **9th day of October, 2023 at 11:55 am, I:**

hand-delivered a true copy of this **Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action with attachments,** to **IPXO LLC care of its Registered Agent, ZENBUSINESS, INC** by and through its authorized agent, **VANESSA GARZA,** at the address of: **5511 Parkcrest Drive, Suite 103, Austin, Travis County, TX 78731,** having first endorsed upon such copy of such process the date of delivery.

I certify that I am approved by the Judicial Branch Certification Commission, Misc. Docket No. 05-9122 under rule 103, 501, and 501.2 of the TRCP to deliver citations and other notices from any District, County and Justice Courts in and for the State of Texas. I am competent to make this oath; I am not less than 18 years of age, I am not a party to the above-referenced cause, I have not been convicted of a felony or a crime of moral turpitude, and I am not interested in the outcome of the above-referenced cause.

Subscribed and Sworn to before me on the 9th day of October, 2023 by the affiant who is personally known to me.

[Handwritten signature of Vivian Smith]

Vivian Smith
PSC-12617, Exp. 5/31/2024

[Handwritten signature of Helen Broussard]
NOTARY PUBLIC

Our Job Serial Number: THP-2023006459
Ref: 2770164



UNITED STATES DISTRICT COURT

for the

Northern District of Texas

In re DMCA Section 512(h) Subpoena to IPXO

Plaintiff

v.

Defendant

Civil Action No. 3:23-mc-00061

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To:

IPXO LLC, c/o ZenBusiness Inc.
5511 Parkcrest Dr., Ste 103, Austin, Texas 78731

(Name of person to whom this subpoena is directed)

☒ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: See Exhibit A

Place: Sul Lee Law Firm, PLLC
3030 Lyndon B. Johnson Fwy, Suite 220
Dallas, Texas 75234

Date and Time:

10/13/2023 12:00 pm

☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 10/03/2023

CLERK OF COURT

s/ N. Taylor

Signature of Clerk or Deputy Clerk



OR

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Sul Lee Law Firm, PLLC 3030 LBJ Fwy, Suite 220, Dallas Texas 75234, who issues or requests this subpoena, are:

Sul Lee, sul@sulleelaw.com

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. _____

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

**RETURN / AFFIDAVIT
PROOF / ATTACHED**

I received this subpoena for *(name of individual and title, if any)* _____
on *(date)* _____.

☐ I served the subpoena by delivering a copy to the named person as follows: _____
_____ on *(date)* _____; or

☐ I returned the subpoena unexecuted because: _____
_____.

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)**(c) Place of Compliance.**

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
 - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

EXHIBIT A
REQUEST FOR PRODUCTION

1. Produce all information sufficient to identify the operator and/or owner (the “Infringers”) of each of the servers who uploaded, hosted, and/or contracted with other providers to host the infringing content identified in Exhibits A-K attached to the DMCA Takedown Notice dated September 22, 2023, sent by Mr. Sungchul Hwang on behalf of Nexon Korea Corporation (“Nexon”), requesting takedown of infringing MapleStory material (the “Copyrighted Material”) attached to this subpoena, from any and all sources, including, but not limited to, billing or administrative records that prove the following information used by each of the Infringers, along with a time-stamp, from the time of user registration and to date: (a) name(s), (b) last known address(es), (c) last known telephone number(s), (d) any and all email address(es), (e) account number(s), and (f) billing information (including, but not limited to, names, telephone number(s), and mailing and billing address(es) of each of all of the payment methods (including, but not limited to, credit cards, bank accounts, and any online payment systems)); (g) hosting provider(s), (h) server(s), (i) any other contact information; and (j) any and all logs of IP address(es).



Oct 19, 2023

Ms. Sul Lee
Sul Lee Law Firm, PLLC
3030 Lyndon B Johnson Fwy, Suite 220
Dallas, Texas 75234

Via email: sul@sulleelaw.com

Re: Responses and Objections of Discord Inc. to DMCA Section 512(h) Subpoena

Dear Ms. Lee:

Alleged service provider Discord Inc. ("Discord" or "Operator"), pursuant to Rules 26 and 45 of the Federal Rules of Civil Procedure and Section 512(h) of the Digital Millennium Copyright Act ("DMCA"), hereby responds and objects to In re DMCA Section 512(h) Subpoena to Discord ("Subpoena" or "Requests") dated Oct. 3, 2023 and propounded on behalf of alleged copyright holder Nexon Korea ("Nexon" or "Owner"), stating as follows:

GENERAL OBJECTIONS AND RESERVATIONS

1. Discord objects to the Requests in their entirety to the extent that they seek documents or information prepared in anticipation of litigation or protected from disclosure by the attorney-client privilege, the work-product doctrine, or any other applicable claim of privilege or protection from or restriction against disclosure under federal, state, or any other applicable or relevant law, regulation, case authority, or principle. Discord asserts all such applicable privileges, protections, and immunities, and any inadvertent disclosure, identification, or production of such documents or information shall not waive those privileges, protections, or immunities.

2. Discord objects to the Requests as seeking the disclosure of electronic communications; the federal Stored Communications Act ("SCA"), 18 U.S.C. § 2701 et seq., strictly prohibits Discord, a service provider within the meaning of the SCA, from disclosing the contents of communications to third parties. A civil subpoena or court order is not sufficient under the SCA to compel production of contents of communications from a provider.

3. Discord respects the right of its users to anonymity and privacy regarding, among other things, personal identifying information (e.g. usernames, passwords, emails, phone numbers, and personal data (e.g. DOB)) and commercial information (e.g. billing information) as

reflected in Discord's Terms of Service, Community Guidelines and Privacy Policy, and consistent with our user's legal rights to privacy. Discord objects to the Requests as seeking disclosure of user information that does not align with these rules, policies and laws, and objects to producing this information except as otherwise required by law or compelled by court order or regulatory body.

4. The Requests have no temporal limitation and are therefore overbroad and unduly burdensome. Unless stated otherwise, Discord objects to providing information that is not limited to the six month period leading up to the date of the Subpoena.

5. Discord objects to the Requests, including the definitions and instructions contained therein, to the extent that they seek to impose obligations on Discord that are different from, or in addition to, the obligations imposed by the Federal Rules of Civil Procedure, the Local Rules of the United States District Court for the Northern District of California, or any other rule, law, or order applicable to this action.

6. Discord objects to the Requests to the extent that they seek documents or information not material or necessary to the present action. No response by Discord should be deemed to constitute an agreement or concession that the subject matter thereof is relevant to this action.

7. Discord objects to the Requests to the extent that they seek documents or information already in a party's possession, custody, or control, outside Discord's possession, custody, or control, as equally available to Discord as to Owner, a matter of public record, already known to Owner, or obtainable from some other source that is more convenient, less burdensome, or less expensive than obtaining the documents or information from Discord.

8. Discord objects to the Requests to the extent that they are vague, ambiguous, duplicative, overbroad, unduly burdensome, intended solely to harass and delay, lacking in specificity, not proportional to the needs of the case, and/or seeking irrelevant information.

9. Discord objects to the Requests to the extent that they assume or imply facts or contentions not established by the record or that are otherwise contradicted. In responding or objecting to the Requests, Discord does not concede, and should not be understood as conceding, the accuracy of any such fact or contention.

10. Discord objects to the terms "Discord Inc" "You," or "Copyright Agent" as undefined, overly broad and as seeking documents or things that are outside Discord's possession, custody or control. Absent a clear definition and specific identification of entities and persons, Discord shall interpret the defined terms "Discord Inc" "You" and "Copyright Agent" to mean Discord, Inc., its officers, directors, employees and any person or entity from whom Discord has the legal right to obtain documents or things on demand.

11. Discord objects to the Requests as infringing its users' decisions to remain anonymous, an aspect of their freedom of speech protected by the First Amendment. The Requests improperly seek to unmask anonymous speakers and consequently compel disclosure of material protected by the First Amendment.

12. Discord objects to the Requests to the extent they seek documents or things that Discord is under an obligation to third parties not to disclose, or information otherwise subject to confidentiality restrictions of a third party.

13. Discord objects to the Requests as requiring more of Discord than making such inquiry as is practical under the circumstances and seeking information beyond what is reasonably available to Discord. Without regard to objections made or not made in these General Objections, Discord reserves the right to make any appropriate objections concerning any documents or information that may be provided in response to the Requests, or otherwise, at any hearing or trial in this matter.

14. Discord objects that the fees, expenses and costs of compliance with the Subpoena are significant and should therefore be shifted to Owner. The Requests seek information sufficient to identify hundreds of individual users and operators and owners of Discord servers. Requiring Discord to provide 10 or more types of identifying information for each of these hundreds of users and server owners or operators based largely on researching the 18-digit identification numbers associated with each of these accounts is harassment, unnecessarily inefficient and imposes undue costs on Discord measured by the significant amount of time and expense required to complete this inquiry. Owner and their counsel have failed to take reasonable steps to avoid imposing undue burden or expense on Discord, as required under Rule 45(d)(1).

15. Discord objects to the Subpoena as commanding production of documents and things at a place that does not comply with Rule 45(c)(2).

16. In many instances, the Owner has failed to allege a prima facie case of copyright infringement, as evidenced by Owner's failure to respond to Discord's request for clarification regarding certain accounts in Owner's DMCA Takedown Notice. Discord objects that the Subpoena is not enforceable in each such instance where Owner has failed to plead or otherwise establish a prima facie claim of copyright infringement.

17. The Subpoena is invalid because it was issued from a court that lacks proper venue and personal jurisdiction over a named service provider.

18. These general objections are incorporated by reference in the specific responses and objections made below, which are made subject to and without waiving these general objections. The specific objections are intended to amplify the general objections, and neither limit the applicability of any of the general objections nor waive any objections which may be applicable to each request.

REQUEST FOR PRODUCTION OF DOCUMENTS

1. Produce all information sufficient to identify the operator and/or owner (the "Infringers") of each of the servers who uploaded, hosted, and/or contracted with other providers to host the infringing content identified in Exhibits attached to the DMCA Takedown Notice dated September 20, 2023, sent by Mr. Sungchul Hwang on behalf of Nexon Korea Corporation ("Nexon"), requesting takedown of infringing MapleStory, MapleStory2, The Kingdom of the Wings, Dungeon & Fighter, Grand Chase, and Elsword material (the "Copyrighted Material") attached to this subpoena, from any and all sources, including but not limited to, billing or administrative records that prove [sic] the following information used by each of the Infringers, along with a time-stamp, from the time of user registration and to date: (a) name(s), (b) last known address(es), (c) last known telephone number(s), (d) any and all email address(es), (e) account number(s), and (f) billing information (including, but not limited to, names, telephone number(s), and mailing and billing address(es) of each of all of the payment methods (including, but not limited to, credit cards, bank accounts, and any online payment systems)); (g) hosting provider(s), (h) server(s), (i) any other contact information; and (j) any and all logs of IP address(es).

RESPONSE TO REQUEST NO. 1

Discord incorporates by reference each of the stated general objections as if fully set forth herein. Discord also objects to this Request as overbroad and unduly burdensome because it seeks "all information," including 10 or more types of identifying information, for each of hundreds of individual users and owners or operators of specific servers, and purports to require Discord to provide this information based on researching the 18-digit identifying numbers that Owner purports to provide for the accounts at issue. Owner and its counsel, by continuing to pursue this information, violate their duty under Rule 45(d)(1) to take reasonable steps to avoid imposing undue burden or expense on the third-party recipient. Furthermore, the costs of complying with the Request are significant; accordingly, Rule 45(d)(2)(B)(ii) requires that these costs be shifted to Owner. In addition, Discord objects to this request as making vague and ambiguous references to "operators and/or owners . . . of each of the servers who uploaded, hosted, and/or contracted with other providers" with no explanation whether and how these accounts infringed copyrighted material. The alleged infringement on which the Subpoena is based is therefore undefined, not clear, and, depending upon a more specific definition, encompasses an unreasonably broad range of topics irrelevant to the claims and defenses of the Owner and alleged infringers in this case and/or is not proportional to the needs of the case.

Subject to its general and specific objections, Discord will produce reasonably accessible, non-privileged documents sufficient to identify the names, street addresses, emails and/or phone numbers, if available, associated with individual user identification numbers ("IUD#s") who are alleged to infringe the copyrighted material, contingent upon Owner and Discord mutually agreeing in advance on reimbursing the reasonable fees, costs and expenses incurred

by Discord in conducting this investigation. Alternatively, subject to Owner and Discord mutually agreeing on reducing the scope of the Subpoena to cover a far more limited number of alleged infringing IUD#s, Discord will produce reasonably accessible, non-privileged documents sufficient to identify the names, emails, street addresses and/or phone numbers, if available, for this limited number of accounts without requiring reimbursement of its fees, costs and expenses.

Sincerely,
/s/ David Bohrer

David Bohrer
Legal Counsel, Discord

Re: DMCA Subpoena

David Bohrer <david.bohrer@discordapp.com>

Wed 11/8/2023 2:40 PM

To: Dominique Williams <DWilliams@sulleelaw.com>

Cc: Sul Lee <sul@sulleelaw.com>; Jessica Findley <JFindley@sulleelaw.com>

Dominique,

Thank you for your email of Nov. 2, 2023.

I don't think we are in full alignment on issues regarding compliance with the subpoena. You say in the email, "[a]ttached, my client has identified a series of users whose information is required to aid in an ongoing investigation and prosecution of infringers. Those accounts are denoted required and color coded green in the spreadsheet." However, the purported narrower group of "required" accounts continues to cover hundreds of UIDs and server/administrator IDs, many of which are not the actual infringers. For reasons previously discussed, it is both unduly burdensome and unnecessary for Discord to address an inquiry of this scope. Please send us a revised response limited to a non-duplicative list of UIDs for the individual users who allegedly posted the infringing content. As I've said before, we reserve all objections pending receipt of this information.

You also say in the email, "[a]s for the accounts that do not have the "required" designation, my client is requesting blocking of those servers and production of information for the administrators of those particular servers, specifically, the narrowed classes of information that we discussed (name, address, telephone numbers, and IP address)." However, Discord has no obligation under 512(h) to "block" any accounts, and it is unduly burdensome to investigate identifying information for servers/administrators that are not the alleged infringing users - we don't agree to do this.

Please let me know if you would like to discuss any of these matters. Unless expressly stated, this communication should not be characterized as agreeing to any specific fact, legal argument or proposal.

Dave

David Bohrer | Legal Counsel | david.bohrer@discordapp.comOn Thu, Nov 2, 2023 at 9:30 AM Dominique Williams <DWilliams@sulleelaw.com> wrote:

Hi David,

I wanted to follow up with our call, and provide you with a spreadsheet detailing the information sought by my client and additional context regarding the request. Attached, my client has identified a series of users whose information is required to aid in an ongoing investigation and prosecution of infringers. Those accounts are denoted required and color coded green in the spreadsheet.

As for the accounts that do not have the "required" designation, my client is requesting blocking of those servers and production of information for the administrators of those particular servers, specifically, the narrowed classes of information that we discussed (name, address, telephone numbers, and IP address).

Please let me know if you have any questions or concerns about the foregoing.

Kind regards,

Dominique Williams Associate Attorney

Ph: [214.206.4064](tel:214.206.4064) Fax: [214.206.4068](tel:214.206.4068)

E: dwilliams@sulleelaw.com

[3030 Lyndon B Johnson Fwy STE 220 Dallas, TX
75234](#)

www.sulleelaw.com



From: David Bohrer <david.bohrer@discordapp.com>

Sent: Monday, October 30, 2023 2:25 PM

To: Dominique Williams <DWilliams@sulleelaw.com>

Subject: Re: DMCA Subpoena

Dominique,

Thank you for contacting me to discuss our objections to the Nexon DMCA 512(h) subpoena.

Confirming our conversation, you asked how much it would cost for Discord to develop the information that is currently requested in the subpoena. I said we had not yet developed a specific estimate pending determination whether Nexon is willing to limit the scope of the subpoena. I said my impression was that the costs would be significant, in the range of tens of thousands of dollars or more, and I said that I could develop a more specific demand if the efforts to otherwise limit the subpoena were not successful.

You advised that you are only interested in obtaining identifying information for the "actual posters of the infringing content," as distinguished from owners and operators of any servers. You agreed to ask your client to identify in writing and share with us this narrower group of users. Depending upon what we learn, this may or may not make a difference, but we need to start somewhere and the requests as currently framed are unduly burdensome.

Regarding the type of identifying information to be provided for each infringing user, you said you are looking for the IP address, email, telephone number and name and street address such as found in billing information. This is still burdensome to research and collect, and we may end up determining that, depending upon the user, certain types of information are not within our possession or control. We should revisit this issue once we receive the above clarification of the infringing users for which information is sought.

Please let me know if this summary is inaccurate or if you have any questions.

That certain issues were not discussed should not be interpreted as Discord waiving any objections; to the contrary, Discord reserves all objections and rights pending the parties' completion of their efforts to informally resolve the discovery disputes.

Sincerely,

Dave

David Bohrer | Legal Counsel | david.bohrer@discordapp.com

On Wed, Oct 25, 2023 at 11:30 AM David Bohrer <david.bohrer@discordapp.com> wrote:
Ms. Williams,

We've received your email and will get back to you shortly on our availability for a call.

Dave

On Tue, Oct 24, 2023 at 10:02 AM Dominique Williams <DWilliams@sulleelaw.com> wrote:
Dear Mr. Bohrer,

I am writing to you in regard to your responses to a subpoena sent on behalf of my client , which I have attached for your review.

Please let me know if you are available this Thursday October 26, 2023 to discuss this matter further.

Kind regards,

Dominique Williams Associate Attorney

Ph: [214.206.4064](tel:214.206.4064) Fax: [214.206.4068](tel:214.206.4068)

E: dwilliams@sulleelaw.com

[3030 Lyndon B Johnson Fwy STE 220 Dallas, TX](https://www.sulleelaw.com)

[75234](https://www.sulleelaw.com)

www.sulleelaw.com



**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re DMCA Section 512(h) Subpoena to Discord

Case No. 3:23-mc-00062-S

AFFIDAVIT OF DIREN W. SINGHE CONCERNING ATTORNEYS' FEES

**STATE OF TEXAS §
COUNTY OF DALLAS §**

BEFORE ME, the undersigned authority, on this day personally appeared Diren W. Singhe, who swore under oath that the following facts are true:

1. “My name is Diren W. Singhe. I am over the age of 18, of sound mind, capable of making this declaration, and personally acquainted with the facts stated therein. The facts stated herein are within my personal knowledge and are true and correct. I maintain a business physical and mailing address at Sul Lee Law Firm, PLLC, 3030 Lyndon B. Johnson Fwy, Ste. 220, Dallas, Texas 75234 (the “Firm”). The Firm is located in Dallas County, Texas.

2. I have been a practicing attorney for over nineteen years, licensed in Texas since 2004, having received my JD from Cornell Law School in Ithaca, New York in 1997, and my BA from the University of California in Irvine, California in 1994. For at least the past 14 years, my practice has primarily consisted of broad commercial litigation and practice, with particular emphasis on startups, professional liability, construction law, international investors, and closely held businesses. For the past two years and 8 months, I have served as the managing attorney at Sul Lee Law Firm, PLLC, the firm that was retained by Nexon Korea Corporation in the above-referenced action. I submit this Affidavit in support of Nexon Korea Corporation’s Motion to Compel Cloudflare, Inc’s responses to the DMCA Section 512(h) Subpoena.

3. Due to ongoing infringement of its intellectual property, it was necessary for Nexon to retain the firm to bring this cause of action. I have personal knowledge of this case and the work performed. I am familiar with the types of fees usually and customarily charged in cases of this type throughout Texas, including Dallas and Denton Counties.

4. As a managing attorney with nearly twenty years' experience practicing in Texas, I bill on this file at a rate of \$575.00 per hour. The Firm's associate Attorney Dominique Williams bills at a rate of \$325.00 per hour, and the Firm's paralegals bills at a rate of \$135.00 per hour depending on experience. It is my testimony that these rates are reasonable and necessary rates in Dallas and Denton Counties, Texas, for the corresponding legal professionals, considering the skill, experience, and qualifications of each in federal matters.

5. To date I have spent .67 hours on this reviewing and finalizing the Motion to Compel and this affidavit.

6. Associate Dominique Williams spent a total of 4.9 hours in preparing the Motion to Compel Discord's Responses to the Subpoena.

7. Under the direction of the above-referenced attorneys, firm paralegals spent .4 hours assisting in preparing supporting evidence for the above-referenced Motion.

8. The hours expended reflected in the totals above are after review and cuts for reasonableness under the circumstances, including the procedural posture of the case and the rules, standards, and norms of this jurisdiction, with which I am familiar.

9. Based on the foregoing reasonable rates and hours, the reasonable and necessary fees for prosecution of Plaintiff's Motion to Compel Discovery Responses are \$2051.25 to date, not inclusive of time needed to prepare for and attend a hearing on such motion, which I reasonably expect to not exceed \$1600.00 to cover the attorney and staff needed to attend same. As such, it is my opinion that a total of \$3651.25 would be a reasonable sanction for Discord, Inc.'s failure to cooperate in discovery.

10. The amount for work performed are taken from the Firm's original billing records, of which I am a custodian, and these records are kept in the usual course of business. These records are entered at or near the time of the events they describe by persons with knowledge of those events. It is part of the normal course of business of the Firm to make such records. I have reviewed the fees and expenses of the Firm in this case, and find that the work performed in this case has been reasonable and necessary.

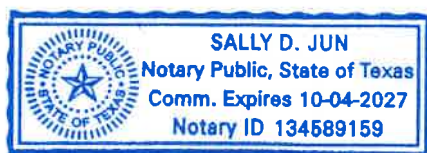
11. I swear under penalty of perjury that the foregoing is true and correct."

SIGNED this 13 day of December, 2023.

BY: 

Diren W. Singhe

SWORD AND SUBSCRIBED to before me on this 13 day of December 2023.




NOTARY PUBLIC, State of Texas